

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>WILLIAM W. HUCKINS, SBN 201098 IVAN M. GOLD, SBN 121486 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP Three Embarcadero Center, 12th Floor San Francisco, CA 94111 415-837-1515 E-mail: whuckins@allenmatkins.com igold@allenmatkins.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Simon Property Group and Brookfield Property Retail Landlords</p>	<p>FOR COURT USE ONLY</p>
<p style="text-align: center;">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re: ESCADA AMERICA LLC</p> <p style="text-align: right;">Debtor(s).</p>	<p>CASE NO.: 2:22-bk-10266-BB CHAPTER: 11</p> <p>NOTICE OF MOTION FOR: (1) OBJECTION OF SIMON PROPERTY GROUP AND BROOKFIELD PROPERTIES RETAIL TO DEBTOR'S SUBCHAPTER V ELECTION OR, ALTERNATIVELY; (2) MOTION FOR APPOINTMENT OF AN OFFICIAL COMMITTEE OF UNSECURED CREDITORS (Specify name of Motion)</p> <p>DATE: April 6, 2022 TIME: 10:00 am COURTROOM: 1539 PLACE: Edward R. Roybal Federal Building and Courthouse, 255 East Temple Street, Los Angeles, CA, 90012</p>

1. TO (specify name): ESCADA AMERICA LLC
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: March 16, 2022

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP

Printed name of law firm

/s/ William W. Huckins

Signature

WILLIAM W. HUCKINS

Printed name of attorney

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Three Embarcadero Center, 12th Floor, San Francisco, CA 94111

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR** (*specify name of motion*)

- (1) OBJECTION OF SIMON PROPERTY GROUP AND BROOKFIELD PROPERTIES RETAIL TO DEBTOR'S SUBCHAPTER V ELECTION OR, ALTERNATIVELY; (2) MOTION FOR APPOINTMENT OF AN OFFICIAL COMMITTEE OF UNSECURED CREDITORS;
- (2) OBJECTION OF SIMON PROPERTY GROUP AND BROOKFIELD PROPERTIES RETAIL TO DEBTOR'S SUBCHAPTER V ELECTION OR, ALTERNATIVELY, MOTION FOR APPOINTMENT OF AN OFFICIAL COMMITTEE OF UNSECURED CREDITORS; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF IVAN M. GOLD;
- (3) DECLARATION OF IVAN M. GOLD SUPPORTING OBJECTION OF SIMON PROPERTY GROUP AND BROOKFIELD PROPERTIES RETAIL TO DEBTOR'S SUBCHAPTER V ELECTION OR, ALTERNATIVELY, MOTION FOR APPOINTMENT OF AN OFFICIAL COMMITTEE OF UNSECURED CREDITORS

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) March 16, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Dustin P Branch	branchd@ballardspahr.com; carolod@ballardspahr.com; hubenb@ballardspahr.com
Eryk R Escobar	eryk.r.escobar@usdoj.gov
Gregory Kent Jones	gjones@sycr.com; smjohnson@sycr.com; C191@ecfcbis.com
John C Cannizzaro	john.cannizzaro@icemiller.com; julia.yankula@icemiller.com
John-Patrick M Fritz	jpf@lnbyg.com; JPF.LNBYB@ecf.inforuptcy.com
Kristen N Pate	ggpbk@ggp.com
Lindsey L Smith	lls@lnbyg.com; lls@ecf.inforuptcy.com
Michael J Darlow	mdarlow@pbfc.com; tpope@pbfc.com
Michael S Kogan	mkogan@koganlawfirm.com
Ronald M Tucker	rtucker@simon.com; cmartin@simon.com; psummers@simon.com; Bankruptcy@simon.com
United States Trustee	ustpregion16.la.ecf@usdoj.gov
Louis T DeLucia	louis.deluc8ia@icemiller.com
Alyson M Fiedler	alyson.fiedler@icemiller.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) March 16, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

John C. Cannizzaro
ICE MILLER LLP
250 West Street, Suite 700
Columbus, OH 43215
Telephone: (614) 462-1070

Escada America, LLC
9720 Wilshire Blvd., 6th Floor
Beverly Hills, CA 90212-0000

Louis T. DeLucia
Alyson M. Fiedler
ICE MILLER LLP
1500 Broadway, Suite 2900
New York, New York 10036
Telephone: (212) 835-6312

Office of the United States Trustee
915 Wilshire Blvd., Suite 1850
Los Angeles, CA 90017

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) March 16, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA FEDEX

Hon. Sheri Bluebond
United States Bankruptcy Court for the Central District of California
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street
Suite 1534 / Courtroom 1539
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 16, 2022 Cynthia D. Lynch
Date Printed Name

/s/ Cynthia D. Lynch
Signature

SERVICE LIST BY MAIL
(Continued)

717 GFC LLC 500 5 th Avenue, 54 th Floor New York City, NY 10110	Woodbury Comm Premium Outlets c/o Simon Property Group 225 West Washington Street Indianapolis, IN 46204-3438 Attn.: Ronald M. Tucker, Vice President/Bankruptcy Counsel
B.W. Hotel, L.L.C. c/o CTF Development 1450 Brickell Avenue, Suite 2620 Miami, FL 33131 Attn.: Brad Hornbacher Senior VP & General Counsel	Premium Outlet Partners LP c/o Simon Property Group 225 West Washington Street Indianapolis, IN 46204-3438 Attn.: Ronald M. Tucker, Vice President/Bankruptcy Counsel
Samson Manage Corp. 97-77 Queens Blvd., Suite 710 Rego, NY 11374	Bal Harbour Shops LLLP 9700 Collins Avenue Bal Harbour, FL 33154
Chicago Oak Street Partners, LLC 1343 N. Wells Street, Rear Bldg. Chicago, IL 60610	Metropolitan Telecomm. P.O. Box 9660 Manchester, NH 03108-9660
Alliant Insurance Services, Inc. 701 B St 6th Floor San Diego, CA 92101	American Express P.O. Box 1270 Newark, NJ 07101-1270
SPG Houston Holdings, LP c/o Simon Property Group 225 West Washington Street Indianapolis, IN 46204-3438 Attn.: Ronald M. Tucker, Vice President/Bankruptcy Counsel	Johnson Controls Security Solutions P.O. Box 371994 Pittsburgh, PA 15250-7994
Las Vegas North Outlets, LLC c/o Simon Property Group 225 West Washington Street Indianapolis, IN 46204-3438 Attn.: Ronald M. Tucker, Vice President/Bankruptcy Counsel	Simon Property Group LP 225 West Washington Street Indianapolis, IN 46204-3438 Attn.: Ronald M. Tucker, Vice President/Bankruptcy Counsel
Ala Moana Anchor Acquisition, LLC c/o Brookfield Properties 350 N. Orleans Street Chicago, IL 60654 Attn.: Julie Minnick Bowden National Bankruptcy Director	Cushman and Wakefield 1290 Avenue of the Americas New York, NY 10104

CHETRIT 1412 LLC P.O. Box 785000 Philadelphia, PA 10018	Funaro & Co., P.C. 350 Fifth Avenue, 41st Floor New York, NY 1011
Syzygy Performance GmbH Osterwaldstra e 10 Munchen, Germany 80805-0000 Germany	Scottsdale Fashion Square LLC P.O. Box 31001-2156 Pasadena, CA 91110-2156